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**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ARIZONA**

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Keith Raniere,

Plaintiff,

- v -

Case No. 4:22-cv-00561-RCC

Merrick Garland, et. al.,

Defendants.

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MOTION TO REQUEST EXTENSION OF DEADLINE
TO FILE RESPONSE IN OPPOSITION TO
DEFENDANTS' MOTION FOR SUMMARY
JUDGMENT

1. Plaintiff Keith Raniere, through his undersigned counsel, hereby moves to request the Court for an order granting a reasonable extension of the deadline to submit a Response in Opposition to Defendants' Motion for Summary Judgment related to the above-captioned case, which was due on January 19, 2024, to February 16, 2024 or any date thereafter that the Court deems acceptable. The reason for the request is as follows:

2. In furtherance of our intention to have Mr. Raniere contribute to the composition of the response, if the filing of one is deemed to be necessary, Mr. Raniere's incarceration continues to pose logistical challenges to enable him to easily participate with our office in the drafting of his response.

3. It continues to be difficult to finalize said Response due to the fact that the Plaintiff has only been afforded 10.25 hours of legal calls with his counsel since December 1, 2023, of which

only 1.78 hours of that time was allowed this year. Additionally, he has not been afforded one legal visit since September 28, 2023. In spite of how punitive this is, Plaintiff made good faith settlement terms offer yesterday.

4. This extension is sought to afford additional time for the undersigned counsel to engage in consultation with Plaintiff regarding a possible settlement offer as well as the filing of his Response. Although this is the sixth request by the undersigned counsel on behalf of Plaintiff for an extension to file a Response in Opposition to Defendants' Motion for Summary Judgment, we feel it necessary considering the current circumstances. Therefore, the undersigned counsel respectfully requests the Court for a reasonable extension to file the Response.

5. Furthermore, Plaintiff has raised the desire to discuss resolution with the Defendants.

6. We have conferred with counsel for the Defendants, and they do not oppose Plaintiff's request for an extension, and consent to the requested date of February 16, 2024.

7. Based on the foregoing, Plaintiff respectfully requests the date to file his Response in Opposition to Defendants' Motion for Summary Judgment be extended to February 16, 2024, or any date thereafter that the Court deems convenient.

Date: January 18, 2024

Respectfully submitted,

/s/ Arthur L. Aidala
Arthur L. Aidala, Esq.
Attorney for Plaintiff

Delivered via ECF
to all Registered Parties